

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

RICHARD BRADDOCK,

Plaintiff,

vs.

ZAYCON FOODS, LLC, a Washington
limited liability company; FRANK R.
MARESCA, JANE DOE MARESCA and the
marital community composed thereof;
MICHAEL GIUNTA, JANE DOE GIUNTA
and the marital community composed thereof;
MIKE CONRAD, JANE DOE CONRAD and
the marital community composed thereof; and
ADAM KREMIN, JANE DOE KREMIN and
the marital community composed thereof,

Defendants.

No. 2:16-cv-01756-TSZ

STIPULATION AND ORDER RENOTING
PLAINTIFF'S AND INDIVIDUAL
DEFENDANTS' MOTIONS FOR
PARTIAL SUMMARY JUDGMENT

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1. The parties filed motions for partial summary judgment on October 24 and 25, 2018. Dkt. #s 119, 124.

3. Good cause exists to re-note the parties' summary judgment motions for the reasons set forth below.

5. On December 3, 2018, attorney Van Dessel filed her Notice of Association of Counsel for Defendants Frank R. Maresca and Jane Doe Maresca. Dkt. # 137.

7. As of the filing of this Stipulation, Attorney Van Dessel has not received a copy of her prior firm's client file, but has been advised it will be delivered tomorrow, December 6, 2018. Attorney Van Dessel will need to incorporate the file in her new firm's system, and have time to adequately participate in the preparation of the reply brief in support of the Individual Defendants' Motion for Partial Summary Judgment.

9. Further, attorney Sarah E. Elsdon, counsel for Defendants Maresca, Kremin, and Conrad, must travel to and appear in another federal court matter in Houston, Texas on Friday, December 7, 2018.

10. Counsel for Individual Defendants consulted with Plaintiff's Counsel, who agreed to stipulate to the request to re-note Defendants' summary judgment motion, in return for the same courtesy for Plaintiff's motion.

11. This request is not made for purposes of delay and will not prejudice the parties by extending the respective reply deadlines by one-week.

12. The parties stipulate and agree to re-note their respective summary judgment motions to December 14, 2018.

Respectfully stipulated and submitted this 5th day of December, 2018.

By s/ Sarah E. Elsdon

Sarah E. Elsdon, WSBA #51158

LEE & HAYES, PC

601 W. Riverside Ave., Ste. 1400

Spokane, WA 99201

Telephone: (509) 944-4682

Fax: (509) 323-8979

Sarah.Elsden@leehayes.com

Attorney for Defendants Frank R. Maresca, Jane Doe
Maresca, Mike Conrad, Jane Doe Conrad, Adam Kremin
and Jane Doe Kremin

By: s/ Geana M. Van Dessel

Geana M. Van Dessel, WSBA #35969

KUTAK ROCK LLP

510 West Riverside Avenue, Suite 800

Spokane, WA 99201-0506

Telephone: (509) 747-4040

Facsimile: (509) 747-4545

Geana.VanDessel@KutakRock.com

Attorneys for Defendant Frank R. Maresca and Jane Doe
Maresca and Michael Giunta and Jane Doe Giunta

By s/David L. Tift

David L. Tift, WSBA #13213
Michael Jay Brown, WSBA #9224
RYAN, SWANSON & CLEVELAND, PLLC
1201 Third Avenue, Suite 3400
Seattle, Washington 98101-3034
Telephone: (206) 464-4224
Facsimile: (206) 583-0359
brown@ryanlaw.com
tift@ryanlaw.com

David G. Trachtenberg, NYSB #1671023
Leonard A. Rodes, NYSB #1927144
Trachtenberg Rodes & Friedberg LLP
545 Fifth Avenue, Suite 640
New York, New York 10017
Phone: 212-972-2929
Fax: 212-972-7581
Email: dtrachtenberg@trflaw.com

Attorneys for Plaintiff Richard Braddock

By s/ Elizabeth Yingling

Elizabeth L. Yingling, TXBA #16935975
(admitted Pro Hac Vice)
BAKER & MCKENZIE LLP
1900 North Pearl, Ste. 1500
Dallas, TX 75201
Telephone: (214) 978-3039
Fax: (214) 965-5972
Elizabeth.yingling@bakermckenzie.com

By s/ Heidi B. Bradley

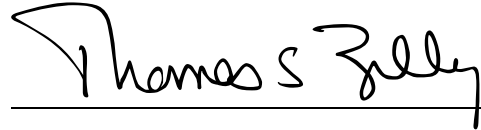
Heidi B. Bradley, WSBA #35759
Genevieve York-Erwin, WSBA #49820
LANE POWELL PC
1420 Fifth Avenue, Suite 4200
P.O. Box 91302
Seattle, WA 98111-9402
Phone: (206) 223-7437
Fax: (206) 223-7107
yorkerwing@lanepowell.com
bradleyh@lanepowell.com

Attorneys for Defendants ZAYCON FOODS, LLC,
MICHAEL GIUNTA, JANE DOE GIUNTA

1 **ORDER**

2 The Court, having reviewed the above stipulation, finds good cause exists to re-note the
3 parties' respective Motions for Partial Summary Judgment (Dkt. # 119 and Dkt. # 124) from
4 December 7, 2018, to December 14, 2018. Both parties' reply briefing will be due on the noting
5 date, pursuant to local rule.

6 DATED this 6th day of December, 2018.

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9 Thomas S. Zilly
United States District Judge

10 Presented by:

11 By s/ Sarah E. Elsden

12 Sarah E. Elsden, WSBA #51158
13 LEE & HAYES, PC
14 601 W. Riverside Ave., Ste. 1400
15 Spokane, WA 99201
16 Telephone: (509) 944-4682
17 Fax: (509) 323-8979
18 Sarah.Elsden@leehayes.com

19 Attorney for Defendants Frank R. Maresca,
20 Jane Doe Maresca, Mike Conrad, Jane Doe Conrad,
21 Adam Kremin and Jane Doe Kremin

22 By: s/ Geana M. Van Dessel

23 Geana M. Van Dessel, WSBA #35969
24 KUTAK ROCK LLP
25 510 West Riverside Avenue, Suite 800
26 Spokane, WA 99201-0506
27 Telephone: (509) 747-4040
Facsimile: (509) 747-4545
Geana.VanDessel@KutakRock.com

Attorneys for Defendants Frank R. Maresca
Jane Doe Maresca, Michael Giunta, and
Jane Doe Giunta

1 By s/ David L. Tift

David L. Tift, WSBA #13213
2 Michael Jay Brown, WSBA #9224
RYAN, SWANSON & CLEVELAND, PLLC
3 1201 Third Avenue, Suite 3400
Seattle, Washington 98101-3034
4 Telephone: (206) 464-4224
5 Facsimile: (206) 583-0359
brown@ryanlaw.com
6 tift@ryanlaw.com

7 By s/ David G. Trachtenberg

David G. Trachtenberg, NYSB #1671023
8 Leonard A. Rodes, NYSB #1927144
Trachtenberg Rodes & Friedberg LLP
9 545 Fifth Avenue, Suite 640
New York, New York 10017
10 Phone: 212-972-2929
11 Fax: 212-972-7581
Email: dtrachtenberg@trflaw.com

12
13 Attorneys for Plaintiff Richard Braddock

14 By s/ Elizabeth L. Yingling

Elizabeth L. Yingling, TXBA #16935975
15 (admitted Pro Hac Vice)
BAKER & MCKENZIE LLP
16 1900 North Pearl, Ste. 1500
Dallas, TX 75201
17 Telephone: (214) 978-3039
18 Fax: (214) 965-5972
Elizabeth.yingling@bakermckenzie.com

19
20 By s/ Heidi B. Bradley

Heidi B. Bradley, WSBA #35759
21 Genevieve York-Erwin, WSBA #49820
LANE POWELL PC
22 1420 Fifth Avenue, Suite 4200
P.O. Box 91302
23 Seattle, WA 98111-9402
24 Phone: (206) 223-7437
Fax: (206) 223-7107
25 yorkerwing@lanepowell.com
bradleyh@lanepowell.com

26
27 Attorneys for Defendants Zaycon Foods, LLC,
Michael Giunta, Jane Doe Giunta

STIPULATION AND ORDER
RE-NOTING THE PARTIES'
MOTIONS FOR SUMMARY JUDGMENT - 6
2:16-cv-1756-TSZ

LEE & HAYES, P.C.
601 West Riverside Ave., Suite 1400
Spokane, Washington 99201
Telephone: (509) 324-9256 Fax: (509) 323-8979